IV. GRANT MANAGEMENT-ADMINISTRATION

Grant Management Administration will be accomplished in three distinct phases: Pre-Award, Active Grant Program Period, and Post-Award. The following identifies the processes for each phase of grant management.

PRE-AWARD PHASE
The Pre-Award Phase begins once the DHS announces that a new grant opportunity exits, continues thru the federal grant application, and concludes with approval of state, local, and/or regional grant applications.

Initial Grant Review

1. The IDHS Grants Management Section will secure information related to grants being made available from DHS. The Grants Management staff will identify the grant's potential function/use and identify those state and local agencies that will be supported by the grant. Grants Management Section Chief will brief the Policy Development and Research Branch Chief, Planning Division Director and Executive Director on the grant scope, purpose, eligibility and likely recipients.
2. The Grants Management Section Chief will identify a Core Group of IDHS program staff and any other state or local agency staff members that will/may be needed to complete the initial grant application and will administer the eligible program activities within the grant. Grants Management Staff will provide the Core Group copies of the Federal Grant Program Guidance and any supporting program documents or information. The Grants Management Section Chief will facilitate a meeting of the Core Group to review and establish the grant's program requirements, to include but not limited to:
   a. Review amount of funding available,
      i. Determine what funding, if any, must be allocated to a given entity or for a specific purpose
      ii. Identify matching fund requirements,
   b. Determine allowable and unallowable program activities and costs,
   c. Determine National or State Goals that could be supported by the program,
      i. Prioritize which Goals must be accomplished first, second, third, etc, to include what levels of funding must be directed to each
      ii. Identify allowable activities/costs that the State wishes to NOT support in this grant
   d. Outline the eligible and non-eligible grant recipients,
      i. Identify the requirements for a minimum pass-thru of funds to local recipients (i.e. 80%),
   e. Determine whether to distribute funds based on a formula, competitive or blended application.
      i. Identify what, if any, funds will be awarded to and spent by the State on behalf of local jurisdictions, and
      ii. Determine what agencies/associations can/will sign a MOU authorizing the State spending on behalf of local jurisdictions,
   f. Determine what information or deliverables are necessary to complete the grant application, and designate what staff will complete this process,

g. Determine what information or tasks are necessary to award and subsequently administer the program to the grant recipients, and designate what staff will complete this process.

Federal Grant Application[1]

1. The IDHS Grants Management Section Chief will oversee and coordinate the grant application process. The IDHS Grants Management Section Chief will ensure pre-application steps have been taken to permit access to and completion of the online grant application (i.e. obtain DUNS # or password to secure website).
   a. Personnel designated during the Initial Grant Review will gather information and develop any reports/data required for the grant application, and provide that data directly to the IDHS Grants Management Section Chief NO LATER THAN 10 business days prior to the grant application deadline.
   b. The IDHS Grants Management Section Chief will present this to the Research and Policy Development Branch Chief and the Planning Division Director for review and approval, and then to Executive Director for review and approval. If necessary, the Executive Director will obtain approval of the application from the Governor's office.
2. The IDHS Grants Management Section Chief staff will make any necessary changes to the application materials, and then submit the application as directed in the Federal Grant Program Guidance.
   a. The IDHS Grants Management Section Chief will ensure the grant application is completed on/before its defined deadline. Copies of the grant application will be maintained by the Grants Management Section Chief.
   b. The Planning Division Director and Executive Director will be advised when the application is complete.
3. The IDHS Grants Management Section Chief will keep the Federal Program Officer informed as to the progress or problems encountered in developing or submitting the State's grant application.
4. Once the application has been submitted, all materials will be forwarded to the IDHS Legal section to begin drafting the sub-grant agreement template and start the Attorney General Form approval process.

Grant Recipient Pre-Award Administration

1. Identify Grant Allocations
   a. The Initial Grant Review will define the amount of funding (by total or percentage) to be available to eligible state, local, and regional applicants as well as the method by which the funds will be allocated (by either a formula or competitive process).
      i. For funds allocated by *formula*, Grants staff will develop a formula by which each eligible participant receives a specified amount of funding. The Executive Director will provide the factors that will be contained in the formula. Grants staff will provide the formula for review and approval to the Executive Director via the Research and Policy Development Branch Chief and Planning Division Director.

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[1] Depending on the grant, the *Grant Recipient Pre-Award Administration* may occur prior to the *Federal Grant Application* e.g. Homeland Security Grant Program.

        ii. For funds allocated by a *competitive* process, the Executive Director will identify the range and/or maximum amount of funds that any one eligible grant participant may submit for in their application. The Executive Director will determine the parameters by which eligible applicants will submit projects for funding consideration.

    b. The method, by which funds are to be allocated and awarded, will be clearly defined in the grant guidance issued to eligible participants.

2. Identify Eligible Grant Applicants.

    a. Grants and Programmatic staff will identify the likely grant applicants (e.g. local, regional, and state). The likely applicants will be those entities, jurisdictions, or agencies best suited to accomplish the programmatic goals of the federal and state grants and priorities. Grants staff will make a final recommendation on eligible applicants to the Executive Director for approval.

        i. Should the grant program require a minimum pass-through of funds to local entities, the staff will ensure those minimums will be met before the recommendation is given to the Executive Director.

    b. IDHS may choose not to offer or accept applications from those entities that are considered to be "High Risk" applicants. An entity may be considered "High Risk" if IDHS determines that the potential grant recipient:

        i. Has a history of unsatisfactory performance;

        ii. Is not financially stable;

        iii. Has a management system which does not meet the management standards set forth in this part;

        iv. Has not conformed to terms and conditions of previous awards; or

        v. Is otherwise not responsible.

    c. Grants staff will identify and brief the Research and Policy Development Branch Chief of any entity that should be considered "high risk" and provide such documentation that supports the cause (as defined above). The Planning Division Director, with concurrence of the Executive Director, will not offer the grant opportunity to the entity or will offer the entity the grant opportunity but apply special conditions/restrictions to the entity's grant award (if approved). Grants staff will notify the entity wishing to participate but considered "high risk" as early as possible in the grant application process of:

        i. The nature of any special conditions/restrictions that may be imposed upon them;

        ii. The reason(s) for imposing conditions/restrictions;

        iii. The corrective actions and the time allowed to address/resolve the imposed condition/restriction; and

        iv. The method of requesting reconsideration of the conditions/restrictions imposed, and subsequent removal of the designation as "high risk".

    d. IDHS will also not issue any grant funds to any potential recipient which is debarred, suspended, or otherwise currently excluded from or ineligible to receive state or federal grant funds. Prior to issuing grant applications or developing grant allocations, Grants staff will review determine those persons-agencies for which findings exist and have not been resolved, and thus should not participate in the grant program.

3. Develop-Issue Grant Application-Program Guidance

    a. As an outcome of the Initial Grant Review, designated grants/program staff will develop grant application and program guidance that is sufficient for the eligible participants to apply for the respective grant funding. The guidance

will define at a minimum the eligible and non-eligible program activities and the eligible and non-eligible costs.

    i. The initial guidance will be developed within thirty (30) days of the Initial Grant Review meeting. It will include forms necessary to submit a "paper" application <u>or</u> to use as an outline to complete an "online" application.

        1. If the grant applications are to be competitive, grants/program staff will also develop an evaluation methodology by which the applications are to be approved or denied. This methodology will be submitted for review and approval along with the grant guidance. The criteria will identify:

            a. What information is to be evaluated and how;

            b. What personnel, sections, and/or agencies will be responsible for the evaluation;

            c. The timeframe in which applications will be reviewed and ultimately accepted or rejected; and

            d. How eligible participants will be told their applications are accepted or rejected (in whole or part).

    ii. The development of the draft guidance will be coordinated by Grants staff working directly with the respective program offices that will ultimately administer portions of the grant program's allowable activities. Grants staff will forward a final draft for review and adoption by the Executive Director.

        1. The Executive Director, may as required, obtain final approval from the Governor's office before issuing the guidance to eligible grant participants.

  b. Grant guidance will be issued to eligible grant participants to provide ample time to develop and submit grant applications. Participants should have at least thirty (30) days in which to complete their applications, but the timeframe may be compressed if required to meet federal deadlines.

    i. Grant application deadlines may vary for state, local and regional applicants in order to facilitate development and evaluation of the applications.

    ii. The Policy Development and Research Branch Chief, with Planning Division Director approval, will establish the appropriate deadlines for grant application submission of eligible state, local and regional participants.

    iii. Waivers to the deadline will only be given and approved by the Policy Development and Research Branch Chief with the concurrence of the Planning Division Director.

4. Evaluation of Grant Applications

  a. Grants staff will receive applications and provide a cursory review and ensure completeness and content of the application packet.

    i. Staff will contact eligible grant recipients should any forms/attachments be missing from the application.

    ii. Clarifications of applications may be made with the submitting entity, but no changes will be made after the grant deadline.

  b. Grants staff will compile a list showing each entity that has in fact submitted an application prior to but not later than the application deadline. Applications received after the deadline will be noted and filed, but will not be included for evaluation.

    c. The Policy Development and Research Branch Chief will establish the meeting date/time/location during which applications will be evaluated and which grants-program staff will participate in the review.
        i. Grants staff will make a final list of applicants as well as copies of each application for review in accordance with the evaluation guidance applicable to the grant.
        ii. At a minimum, Grants and Program staff will confirm all costs are eligible with federal grant program guidance:
            a. Equipment costs must be listed on the Authorized Equipment List (AEL) specified for the grant with a clear nexus to homeland security and/or dual-use for all-hazard preparedness and response; and
            b. General costs (e.g. Personnel, Travel) under Planning, Organization, Training, Exercise, and Administration will also be evaluated as needed against the cost principles found in OMB Circular A-87.
    d. Grants and program staff will determine which applications are funded in whole, which are to be funded in part, and those not to be funded. Staff will identify and document the reasons as to why project costs were determined to only be funded in part or not funded.
    e. Staff will complete evaluations so that all funding can be fully committed to eligible grant recipients. Final funding allocations will then be briefed thru the Research and Policy Development Branch Chief, Planning Division Director and the Executive Director for final concurrence on funding allocations.
    f. Once final allocations are determined, Grants staff will:
        i. Coordinate with Fiscal and Program Management staff to develop grant packages for those entities whose applications were accepted; and
        ii. Draft letters, for the Executive Director's signature, to those entities who application was not accepted to include the reason(s) why their application was rejected in part or whole.
5. Internal IDHS Budget Development
    a. As a final step within the pre-award phase, IDHS will develop its own budget and grant application that identifies what grant funds will be used by the Agency to complete and fund eligible activities with the grant. This will not include costs allocated to individual Grant Recipients unless the Agency is authorized to spend those funds on behalf of a state or local jurisdiction.
    b. The Policy Development and Research Branch Chief will coordinate the budget development and subsequent application, but individual activities and costs will be scripted by the respective program areas.
    c. The identified program areas will submit the Agency's budget and grant application in the same timeframe and format as required of the other state agencies.

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